

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

IN RE:)	
)	Bankruptcy No. 22-20823-GLT
U LOCK, INC.)	
)	Chapter 7
Debtor)	
*****)	
ROBERT H. SLONE, TRUSTEE)	Document No.
)	
Movant)	
)	
vs.)	
)	
CHRISTINE BIROS, FRED BANKS, DAVID PERLA,)	
DENNY DULL, JOHN DULL, GARY CHERIPKA,)	HEARING DATE: 10/6/22@10:30 a.m.
GLENN MOWRY, INW, JAR COAL COMPANY,)	COURTROOM A—PITTSBURGH
JAMES CLAWSON, JEFFREY SHAW, JENNIFER)	
VERRICO, MARK MYKA, PA TURNPIKE TOLL)	
BY PLATE, PETERS PAINTING, R.J. ABREU,)	
R. WOODALL, RSS, RICOBERTO NEGRETE)	
GALENO. SARA STUMME, SHANNI SNYDER,)	
SHARON McCANCE, SHELLY CHABANDE,)	
BEN SHABANDE, STEPHEN CHAPAS, TERRY)	
NOLL, TONY DAVIS, UNITED STEELWORKERS,)	
WEST PENN POWER, WESTMORELAND COUNTY))	
TAX CLAIM BUREAU, AND RENEE BASISTA,)	
)	
RESPONDENTS)	

TRUSTEE'S MOTION TO SELL PERSONAL PROPERTY OF THE ESTATE—RIGHTS OF THE CHAPTER 7 TRUSTEE REGARDING PROPERTY LOCATED AT 14140 U.S. ROUTE 30, NORTH HUNTINGDON, PA

AND NOW, comes the Trustee, Robert H. Slone, by and through his attorneys, Mahady & Mahady—Robert H. Slone, Esquire, and brings forth the within Motion to Sell Personal Property of the Estate—Rights of the Chapter 7 Trustee Regarding Property Located at 14140 U.S. Route 30, North Huntingdon, PA, and states as follows:

1. The case of the Debtor, U Lock, Inc. (“U Lock”), was commenced by the filing of an involuntary petition for relief under Chapter 7 of Title 11 of the United States Code at the above number on April 27, 2022.
2. This court has jurisdiction over this Motion pursuant to 28 U.S.C. § 171(a), (b) and (c). Venue is proper in this district pursuant to 28 U.S.C. § 1473(a).
3. Robert H. Slone is the duly appointed Chapter 7 Trustee for the Debtor and is so acting.

4. Among the assets of the estate are any claims and/or causes of action that the Trustee may have regarding the property located at 14140 U.S. Route 30, North Huntingdon, PA ("Claims/Causes of Action"), which would include any action under Sections 547 and 548 of the Bankruptcy Code, and any state law remedies.
5. The Trustee has received an offer of \$19,000.00 from USAAG Systems, Co., 2389 Main Street, Glastonbury, CT 06033-7617, mailing address c/o Attorney Services, P.O. Box 9007, Providence, RI 02940, to purchase the Claims/Causes of Action.
6. All Claims/Causes of Action are sold is "AS IS", "WERE IS" with no warranties of any type.
7. The Trustee avers that the best interest of this estate and its creditors will be served by this Court authorizing the sale of the Claims/Causes of Action because it will net funds to the Trustee toward the payment of creditors.
8. The Trustee avers that the sales price is fair and reasonable under the circumstances but will welcome higher bids at the time of sale and confirmation.
9. The terms of the sale are: hand money in the amount of \$4,000.00 and the balance of the sale amount to be paid within 30 days of confirmation of the sale.
10. The Trustee recommends that he be authorized to consummate the sale of the Claims/Causes of Action to the buyer or to such other person or entity as may make a higher offer at the hearing thereon.

WHEREFORE, the Trustee respectfully request this Honorable Court to authorize the sale of the Claims/Causes of Action as listed in the within motion. A hearing is to be held in this Court with the sale being confirmed to the highest and best offer.

Respectfully submitted,

Date: August 30, 2022

/s/ ROBERT H. SLONE
Robert H. Slone, Esquire
PA ID No. 19963
MAHADY & MAHADY
223 South Maple Avenue
Greensburg, PA 15601
(724) 834-2990
robertslone223@gmail.com

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BEN SHABANDE, STEPHEN CHAPAS, TERRY)	
NOLL, TONY DAVIS, UNITED STEELWORKERS,)	
WEST PENN POWER, WESTMORELAND COUNTY))	
TAX CLAIM BUREAU, 11585274 CANADA INC.)	
AND RENEE BASISTA)	
RESPONDENTS)	

**CERTIFICATE OF SERVICE FOR TRUSTEE'S MOTION FOR SALE
OF PROPERTY OF THE ESTATE, HEARING NOTICE AND PROPOSED ORDER**

I, Robert H. Slone, certify under penalty of perjury that on August 30, 2022 I served true and correct copies of the above-referenced documents upon the following persons and parties in interest at the addresses shown by United States First Class Mail, postage prepaid, as follows:

List "A" was served all the above referenced documents.

List "B" was served the Hearing Notice only.

EXECUTED ON: August 30, 2022

By: /S/ ROBERT H. SLONE

Robert H. Slone, Esquire

PA ID No. 19963

MAHADY & MAHADY

223 South Maple Avenue

Greensburg, PA 15601

(724) 834-2990

robertslone223@gmail.com

LIST "A"

Office of the U.S. Trustee
Liberty Center, Ste. 970
1001 Liberty Avenue
Pittsburgh, PA 15222

J. Allen Roth, Esquire
805 S. Alexandria Street
Latrobe, PA 15650

USAAG Systems Co.
c/o Attorney Services
PO Box 9007
Glastonbury, CT 06033-4617

William E. Otto, Esquire
Law Firm of William E. Otto, Esq.
PO Box 701
Murrysville, PA 15668

Christine Biros
c/o Bernstein-Burkley, PC
Sara E. Wenrich
601 Grant Street, 9th Floor
Pittsburgh, PA 15219

Christine Biros
435 Millers Lane
Pittsburgh, PA 15239

LIST "B"

11585274 Canada Inc.
663 Ave Orly
Durval QC Canada
H9P1G1

Fred Banks
52 S. 8th
Pittsburgh, PA 15203

David Perla
550 Beatty Drive
Irwin, PA 15642

John Dull
120 Kline Avenue
North Versailles, PA 15137

Denny Dull
120 Kline Avenue
North Versailles, PA 15137

Gary Cheripka
123 Catskill Avenue
Pittsburgh, PA 15227

Glenn Mowry
524 8th Street
Irwin, PA 15642

INW
800 E Wishkah Street #1003
Aberdeen, WA 98520

JAR Coal Company
1985 Lincoln Way
STE 23-333
White Oak, PA 15131

James Clawson
2437 Saunders Station Road
Monroeville, PA 15146

Jeffrey Shaw
140 Carriage Drive
Irwin, PA 15642

Jennifer Verrico
16 Goldstrom Avenue
Dravosburg, PA 15034

Mark Myka
5148 Peach Street #401
Erie, PA 16509

PA Turnpike Toll by Plate
PO Box 645631
Irwin, PA 15642

Peters Painting
14354 Overholt Drive
Irwin, PA 15642

R J. Abreu
39 ½ Wedgwood Drive 1009
Jewett City, CT 06351

R. Woodall
Apartado 10199
San Jose, Costa Rica, 00000

RSS Attn: Bawani
5307 Victoria Drive #185
Vancouver BC Canada V5P3V6

Ricoberto Negrete Galeno
3048 Norland Street
Carnegie, PA 15106

Sara Stumme
2705 Bowman Avenue
McKeesport, PA 15132

Shanni Snyder
14390 Route 30, Unit H
Irwin, PA 15462

Sharon McCance
PO Box 185
Irwin, PA 15642

Shelly Chabande
799 Brownstone Road
Larimer, PA 15647

Ben Chabande
799 Brownstone Road
Larimer, PA 15647

Stephen Chapas
273 Shasta Drive
Pittsburgh, PA 15239

Terry Noll
1257 Colt
Irwin, PA 15642

Tony Davis
6 Liberty Square
Boston, MA 02109

United Steelworkers
Attn: James Hill
386 Toura Drive
Pittsburgh, PA 15236

West Penn Power
76 South Main Street
Akron, OH 44308

Westmoreland County Tax
Claim Bureau
2 North Main Street, Ste. 109
Greensburg, PA 15601

Renee E. Basista
9 Donna Drive
Irwin, PA 15642